

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Vashti Smith-Foote

Debtor

CHAPTER 13

THE BANK OF NEW YORK MELLON f/k/a THE
BANK OF NEW YORK as Trustee for the CWMBS
Reperforming Loan REMIC Trust Certificates, Series
2005-R1

Movant

NO. 16-12383 AMC

vs.

Vashti Smith-Foote

Debtor

11 U.S.C. Section 362

William C. Miller Esq.

Trustee

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

THE BANK OF NEW YORK MELLON f/k/a THE BANK OF NEW YORK as Trustee for the CWMBS Reperforming Loan REMIC Trust Certificates, Series 2005-R1 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion, then on or before **August 25, 2016**, you or your attorney must do all of the following:

- (a) file an answer explaining your position at:
United States Bankruptcy Court
Robert N.C. Nix Building
900 Market Street, Suite 400
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

- (b) mail a copy to the movant's attorney:
Joshua I. Goldman, Esquire
Thomas Puleo, Esquire
KML Law Group, P.C.
Suite 5000 - BNY Mellon Independence Center
701 Market Street
Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Ashley M. Chan, the United States Bankruptcy Judge, in Courtroom 5 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on **September 6, 2016, at 11:00AM**, or as soon thereafter as counsel can be heard, to consider the motion.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Joshua I. Goldman, Esquire

Joshua I. Goldman, Esquire

Thomas Puleo, Esquire

Attorneys for Movant/Applicant

Main Phone #: 215-627-1322

August 11, 2016